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CLERK U.S. DISTRICT COURT  
DISTRICT OF DELAWARE  
2006 FEB 16 PM 4:39

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MEMBER DEL. AND FLA. BARS

February 16, 2006

The Honorable Kent A. Jordan  
U.S. District Court  
844 King Street  
Wilmington, DE 19801

Re: U.S. v. Lipscomb  
Cr.A. No. 05-91-KAJ

Dear Judge Jordan:

The purpose of this correspondence is to request a "STAY", if you will, of the deadline for the submission of voir dire questions. Ordinarily, it would be Shannon Hanson who would be making the request, and, indeed, she does not even know I am making this request. At least, she will not know until she receives this letter.

Within the past one week, the likelihood of resolving the case, by a plea, has gained momentum to the point that I believe it is a probability exceeding 90 percent that the matter will be resolved.

The reason I am directing this correspondence is because I am the one who is responsible for this situation. Several weeks ago, I experienced some significant health issues and which resulted in my absence from the office with regard to doctors' appointments, diagnostic tests and the like. That in turn "mushroomed" so that whatever I can call my "usual efficiency" has been dramatically compromised. Part of that compromise was my delay in effecting a thorough review of the Lipscomb matter and which was necessary before my client could "see the light". Shannon has been patient yet diligent in "reminding" me of the pendency of the matter. I have recently dispatched a Case Evaluation to my client, and a meeting will be scheduled this coming weekend so that I expect, on Monday, or Tuesday, at the latest, to announce the final "verdict" with

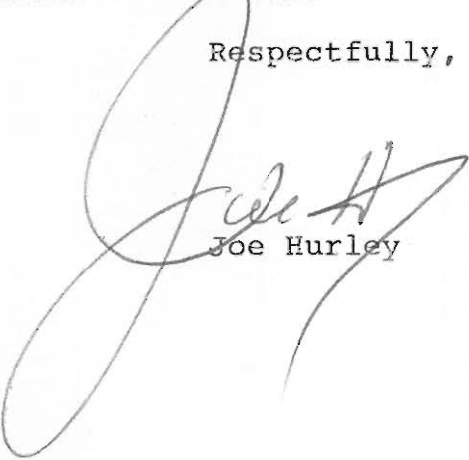
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regard to the acceptance of a plea.

Under the circumstances, therefore, I would ask that the deadline be extended until Friday, February 24th and for the obvious reasons indicated herein.

Respectfully,



Joe Hurley

JAH:jr

pc: Shannon Hanson, Esquire  
FAX: 573-6220